



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 5, 2022

BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

Re: **United States v. Cahill et al., 20 Cr. 521 (CM)**

Dear Judge McMahon:

The Government respectfully submits this letter motion to adjourn the pretrial deadlines in this case. Trial is scheduled for January 18, 2023, and the remaining defendants—James Cahill, Robert Egan, Arthur Gipson, and Kevin McCarron—previously requested that pretrial deadlines for motions in limine, Rule 404(b) notice, and 3500/Giglio be adjourned until tomorrow, December 6, 2022, to permit the parties time to reach dispositions.

All four remaining defendants have now advised the Government that they will be pleading guilty, and the plea hearings are scheduled for this week and next week. Accordingly, the Government respectfully requests that the pretrial deadlines—which will be obviated by the entry of the contemplated pleas—be adjourned to a date two days after the last scheduled plea.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
Jun Xiang / Frank J. Balsamello / Marguerite Colson
Assistant United States Attorneys
Laura de Oliveira
Special Assistant United States Attorney

CC (By ECF)

All Counsel of Record

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/5/22